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State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
ENFORCEMENT ELEMENT
TWIN RIVERS OFFICE PLAZA
State Highway 33
Hightstown, New Jersey 08520

JOHN W. GASTON JR., P.E.
DIRECTOR

DIRK C. HOFMAN, P.E.
DEPUTY DIRECTOR

Mr. Joseph A. Skladanek
Plant Engineer
Lenox China
Tilton Road
Pomona, New Jersey 08240

RE: RCRA Inspection
Lenox China
EPA I.D. #NJD002325074
NJPDES #NJ0005177 - RCRA, DGW/IWMF
Galloway Township/Atlantic

CASE - MAR 5 1986

Dear Mr. Skladanek:

A Resource Conservation Recovery Act (RCRA) inspection (inspection reports attached) of your facility was conducted by representatives of this Division on February 4, 1986.

As a result of the inspection the following deficiencies were noted:

1. Monitoring Well #2 exceeds the permit limits for lead.
2. Monitoring Well No's. 1, 4, 6 and 8 exceeded the permit limit for manganese.
3. Monitoring Well No's. 7 and 8 exceeded the permit limits for Total Coliform.
4. Monitoring Well No's. 2 and 3 exceeded the permit limits for Total Dissolved Solids.
5. Analytical data for gross alpha and gross beta has not been submitted for the last reporting period.

ENVIRONMENTAL PROTECTION
DIVISION
RECEIVED
MAR 11 1986
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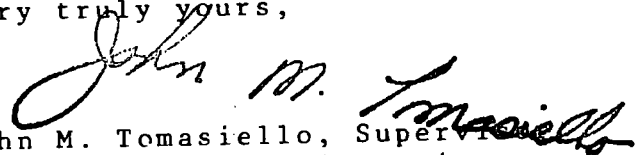
Since the deficiencies cited are in violation of the Ground Water Quality Standards N.J.A.C. 7:9-6.6, you are Directed to contact Ms. Kathy Davies, Bureau of Ground Water Discharge Permits at (609) 292-0424, within fifteen (15) calendar days of receipt of this correspondence for the purpose of scheduling a meeting to discuss corrective measures which must be taken to correct the deficiencies.

Written confirmation of the meeting when scheduled, must be submitted to this office.

The inspection report and letter covering the discharge to surface water (DSW) inspection conducted at your facility on February 4, 1986, will be forwarded shortly.

If you have any questions regarding this letter, please call the writer at (609) 426-0791.

Very truly yours,



John M. Tomasiello, Supervisor
Compliance Monitoring Unit
Southern Bureau of
Regional Enforcement

A35:ral

Attachment

cc: Assistant Director George G. McCann
Ken Siet/Attach.
Kathy Davies/Attach.
C. Kenna Amos, Jr., USEPA/Attach.
J. Golumbek, USEPA/Attach.
J. Aiello, Atlantic County Health Department

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

Lenox China, Inc. manufactures fine china. the process includes molding, firing and glazing. Final touches are done in the etching shop.

The Glaze Basin is inactive and covered with plastic. The plastic cover is in good shape, no tears or rips.

The Slip Basin's earthen embankments have been increased to provide at least two (2) feet of freeboard.

The facility has in its operating record a detailed chemical and physical analysis of a representative sample of the waste in the impoundments.

The analytical data of the monitoring wells indicate that the manganese levels in wells #1, #4, #6, and #8 have exceeded the permit limits, that the lead level in well #2 exceeded the permit limits and that the total coliform levels have in wells #7 and #8 have exceeded the permit limits.

The Total Dissolved Solids (TDS) levels in wells #2 and #3 have exceeded the permits limits.

There is no analysis data indicating that gross alpha and gross beta were sampled for during the last reporting period.

7:14A-6

Groundwater monitoring

(Applies only to: surface impoundments, landfills, land disposal facilities)

7:14A-6.2

Does the owner/operator have a groundwater monitoring plan approved by the Department and capable of determining the facility's impact on the quality of groundwater?

YES NO N/A

If no, please explain.

How many monitoring wells has the facility installed? 7 monitoring wells
1 piezometer for monitoring ground water level.

What is the depth to groundwater?

#1-- 10.9'	#5-- 6.5'
#2-- 11.6'	#6-- 7.7'
#3-- 8.9'	#7-- 9.7'
#4-- 4.4'	#8-- 9.3'

How many deep monitoring wells are onsite?
(Indicate depth of monitoring wells)

None

How many shallow monitoring wells are onsite?
(Indicate depth of monitoring wells) Seven (7)

#1-- 27.75'	#6-- 28.70'
#2-- 28.00'	#7-- 24.00'
#3-- 28.40'	#8-- 28.00'
#4-- 26.00'	

7:14A-6.3(a)

Is the groundwater monitoring system capable of yielding groundwater samples for analysis?

YES

If no, please explain.

7:14A-6.3(a)1

Are monitoring wells installed hydraulically upgradient?

YES

If yes, specify how many and the depth of each. One (1), monitoring well #1- 27.75 depth to bottom of casing with 20' of screen.

YES NO

7:14A-6.3 a 1

How many monitoring wells are installed hydraulically down gradient? Six (6)

YES

If yes, specify how many and the depth of each. Six (6)

- #2-- 28.00' - 20' screen
- #3-- 28.40' - 20' screen
- #4-- 26.00' - 20' screen
- #6-- 28.70' - 20' screen
- #7-- 24.00' - 20' screen
- #8-- 28.00' - 20' screen

7:14A-6.4(a)

Does the owner/operator have a groundwater sampling and analysis plan?

YES

If no, please explain.

7:14A-6.4(a)

Does the plan include procedures and techniques for:

1. Sample collection
2. Sample preservation and shipment
3. Analytical procedures
4. Chain of custody

YES
YES
YES
YES

7:26-11.3

Surface Impoundments

Describe the design and operating features of the surface impoundment to prevent groundwater contamination (e.g., liner leachate collection system).

Periodic dredging of SLIP BASIN (Primary Clarifier) and POLISHING LAGOON. Also Tilton Road Pond as needed. Solids form an impermeable liner and therefore some solids are always left when dredging to form a liner.

Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of waste stored and treated.

Slip Basin (Clarifiers)--- 1.5 mg
Polishing Pond----- 0.11 mg
Tilton Road Pond----- 0.125 mg

7:26-11.3 a

Is there at least 2 feet of freeboard in the impoundment?

YES

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-11.3	Do all earthen dikes have a protective cover to preserve their structural integrity?	<u>YES</u>	___	___
	If yes, please specify the type of covering.			
	Native vegetation growing			
7:26-9.4(b)1	Does the owner/operator have a detailed chemical and physical analysis of a representative sample of the waste in the impoundment?	<u>YES</u>	___	___
7:26-9.4(c)2	Does the owner/operator place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility?	<u>YES</u>	___	___
7:26-11.3(d)	Does the owner or operator inspect:			
7:26-11.3(d)1	The freeboard level at least once each operating day to ensure compliance with subsection 11.3(a)?	<u>YES</u>	___	___
7:26-11.3(d)2	The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment?	<u>YES</u>	___	___
7:26-11.3(f)	Is ignitable or reactive waste placed in the surface impoundment?	___	<u>NO</u>	___
7:26-11.3(f)1	If yes, is the waste treated, rendered, or mixed before or immediately after placement in the impoundment?	___	<u>NO</u>	___
7:26-11.3(f)11	Does the resulting waste, mixture, or dissolution of material no longer meet the definition of ignitable or reactive waste?	___	<u>NO</u>	___
7:26-11.3(f)111	Is the waste treated, rendered or mixed so that it does not:			
7:26-9.4(e)21	Generate extreme heat or pressure, fire or explosion, or violent reaction?	___	___	<u>N/A</u>
7:26-9.4(e)211	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	___	___	<u>N/A</u>
7:26-9.4(e)2111	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?	___	___	<u>N/A</u>

	YES	NO	N/A
7:26-9.4(e)2iv			N/A
7:26-9.4(e)2v			N/A
7:26-11.3(f)2		NO	
7:26-11.3(g)		NO	
7:26-9.4(e)2i			N/A
7:26-9.4(e)2ii			N/A
7:26-9.4(e)2iii			N/A
7:26-9.4(e)2iv			N/A
7:26-9.4(e)2v			N/A

waste Piles

How many waste piles are on-site and approximately how large are they? (Please indicate size and height and types of wastes in piles.)

Is the waste pile protected from wind erosion? _____

a) Does it appear to need such protection? _____

b) Explain what type of protection does exist. _____

7:26-9.3 a 5- Is the waste pile larger than 100 cubic yards? _____

SOURCE: Lab analysis sheets PERIOD: Nov. 85

[illegible]